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July 26, 2019

**VIA ECF**

The Honorable Katharine H. Parker  
United States Magistrate Judge  
United States District Court – S.D.N.Y.  
500 Pearl Street, Room 750  
New York, New York 10007

**Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,  
No. 15-CV-5345 (AJN)(KHP)**

Dear Judge Parker:

We represent Triadou SPV S.A. (“Triadou”) and write on behalf of Triadou, the Kazakh Entities, and the Khrapunovs to respectfully request limited relief from the Court’s order scheduling an evidentiary hearing on August 8, 2019. (ECF 1103). Due to a scheduling conflict, Triadou’s sole witness, Cesare Cerrito, cannot attend the hearing on August 8. Triadou raised this conflict with the other parties promptly after the Court issued its order, and since then, the parties have been attempting to find a solution. The parties now propose that the Court allow Mr. Cerrito to testify separately from the rest of the witnesses scheduled to attend because his testimony goes to a distinct issue (i.e., the Kazakh Entities’ sanctions motion).

To facilitate rescheduling, we have obtained available dates from Mr. Cerrito: August 26-30 and September 12-13. Counsel for Triadou and the Kazakh Entities are available on all of these dates. Mr. Solomon, the main trial counsel for the Khrapunovs, is available for the August dates, and can have one of his colleagues appear if the Court selects a September date. If the Court selects a September date, therefore, counsel for the Khrapunovs has asked that the Court please refrain from taking up any issues other than Mr. Cerrito’s testimony and the Kazakh Entities’ sanctions motion against Triadou—a request to which the other parties do not object.

The parties otherwise intend to proceed on August 8 with the remainder of the evidentiary hearing, as contemplated by the Court’s July 11 Order (i.e., examining the other identified witnesses concerning Triadou’s and the Khrapunovs’ sanctions motions). Accordingly, the parties respectfully request that the Court permit Mr. Cerrito to testify on one of the proposed alternative dates above in lieu of attending the August 8 hearing. Thank you for your consideration.

Respectfully submitted,

s/ Deborah A. Skakel  
Deborah A. Skakel